

Nancy S. Martin
Associate General Counsel



September 18, 1991

Mr. Peter Felitti
Assistant Regional Counsel
USEPA - Region V
230 South Dearborn Street
Chicago, Illinois 60604

Re: Great Lakes Asphalt Site

Dear Mr. Felitti:

This letter is written in response to your September 4 letter to Federal-Mogul Corporation regarding the Great Lakes Asphalt Site. Federal-Mogul and its subsidiary Switches, Inc. are members of the Enviro-Chem PRP group and signatories to the 1983 Enviro-Chem Consent Decree. We understand that the ECC Steering Committee will be contacting you on behalf of all of its members regarding EPA's de minimis proposal.

In the meantime, I am sending along a section from the BNA Environmental Reporter which I thought might interest you. Like many Region V manufacturers, we agree that Region V's "prosecution approach" tends to increase transaction costs and encourage PRPs to take defensive, rather than cooperative, postures with respect to superfunds. We encourage your agency to begin to look for better ways to make the relationship between EPA and PRPs less adversarial.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'Nancy S. Martin'.

Nancy S. Martin

cc. J. Dennis